

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MICHELLE GORE,

Plaintiff,

v.

NEW PRIME, INC., ACE  
AMERICAN INSURANCE  
COMPANY, and TYLER LEE  
COOPER,

Defendants.

Civil Action File No. \_\_\_\_\_

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**DEFENDANT NEW PRIME, INC.'S CERTIFICATE OF INTERESTED  
PERSONS AND CORPORATE DISCLOSURE STATEMENT**

(1) The undersigned counsel of record for a party to this action certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

- a. New Prime, Inc.;
- b. ACE American Insurance Company; and
- c. Tyler Lee Cooper.
- d.

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

a. Other than individuals and entities who are parties to this case, there are no other persons, associations, firms, partnerships, or corporations known to Defendants which either have a financial interest in this litigation or other interest which could be substantially affected.

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

a. Elizabeth L. Bentley, Swift Currie McGhee & Hiers, LLP; and,  
b. Thomas Rainey, Esq., Morgan and Morgan.  
c.

This 14th day of April, 2023.

*(Signature on following page)*

Respectfully submitted,  
**SWIFT, CURRIE, McGHEE & HIERS, LLP**

*/s/ Elizabeth L. Bentley*

By: ELIZABETH L. BENTLEY, ESQ.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing **Defendant New Prime, Inc.'s Certificate of Interested Persons and Corporate Disclosure Statement** by filing same with the Clerk of Court using the CM/ECF (Pacer) system which will automatically send an electronic copy of same to all parties and counsel of record as follows:

Thomas Rainey, Esq.  
MORGAN & MORGAN ATLANTA PLLC  
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Atlanta, GA 30343  
[trainey@forthepeople.com](mailto:trainey@forthepeople.com)  
*Attorneys for the Plaintiff*

This 14<sup>th</sup> day of April, 2023.

*/s/ Elizabeth L. Bentley*

By:

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

# SWIFT, CURRIE McGHEE & HIERS, LLP